

ECUADOR ANNEX
PERSONAL DATA PROTECTION AND PROCESSING POLICY - ECUADOR**1. Applicable Regulations**

Organic Law on Protection of Personal Data (Fifth Supplement No. 459) (hereinafter referred to as the “LOPD”) relating to the protection of individuals with regard to the processing of their personal data.

2. Responsible (owner) of the Personal Data Bank

- GHU UIO SAS (Sheraton Quito)
 - RUC: 1793198474001
 - Av. Republica del Salvador N36-212 and NNUU Quito
- GHU GYE SAS (Sheraton Guayaquil)
 - RUC: 0993374210001
 - Av. Joaquín Orrantia G. Plaza del Sol in front of Mall del Sol, Guayaquil
- GHU Ecuador SAS (Sonesta Loja, Four Points Sheraton Cuenca and Radison Guayaquil)
 - RUC: 1793197658001
 - Av. Republica del Salvador N36-212 and NNUU Quito
- Holding Hotelera GHU SAS
 - NIT: 901580112 2
 - Central Office: Calle 72 # 6-30, Bogotá – Colombia
 - Telephone: +57 3139333

3. Definitions

Database or file: Structured set of data regardless of the form, method of creation, storage, organization, type of support, treatment, processing, location or access, centralized, decentralized or distributed functionally or geographically.

Consent: Manifestation of free, specific, informed and unequivocal will, by which the owner of the personal data authorizes the person responsible for the processing of personal data to process the same.

4. Legitimation for the processing of personal data

4.1 Guests and Clients

Legitimation	Purpose
Execution of a contract	Reservation and registration management
	Reception and hotel stay services
	Payment management and billing of services
	Management of third-party services contracted by the hotel (for example, transportation or tourism services)
	Management of relationships with suppliers and external service providers
Legitimate interest	Attention and management of requests, queries and complaints
	Sending information and advertising about promotions, events and hotel services
	Analysis of preferences and consumption habits to improve the quality of services
	Analysis of the effectiveness of marketing strategies and continuous improvement of the services offered
	Security and privacy protection
	Access control and security in hotel facilities
	Conducting market studies and competitor analysis
Consent	Sending information and advertising about promotions, events and hotel services
	Management of customer loyalty programs and personalized offers
Compliance with a legal obligation	Compliance with legal and tax obligations
vital interest	Attention to medical emergencies and health risk situations

4.2 Owner, Suppliers, Candidates, Collaborators and Retired Collaborators

The legitimation of the processing of personal data of suppliers, Candidates, Collaborators and retired Collaborators will be carried out mainly based on the provisions of section 5) of article 7 of the LOPD, that is, for the execution of pre-contractual measures at the request of the owner or to

compliance with contractual obligations pursued by the Hotel or a legally authorized third party. Likewise, they may be processed based on the legitimate interest of GHL.

In this way, the legitimizing bases of GHL within the framework of its relationship with Owners, Suppliers, Candidates, Collaborators and retired Collaborators are based on:

- i. Numeral 5 of article 7 of the LOPD, for the execution of pre-contractual measures at the request of the Owner or for the fulfillment of contractual obligations pursued by the person responsible for the processing of personal data, Person in Charge of the processing of personal data or by a legally authorized third party, which are necessary to formalize the contract and the execution of the provider's service.
- ii. Numeral 4 of article 7 of the LOPD, carried out in compliance with a legal obligation, when it is necessary to comply with the legal requirements regarding Social Security, taxes, arising from a collective agreement, among others.
- iii. Numeral 7 of article 7 of the LOPD, to satisfy a legitimate interest of GHL or a third party, provided that the interest or fundamental rights of the Owners do not prevail under the provisions of the LOPD. The application will be carried out, in any case, in a proportionate and as least intrusive manner as possible.
- iv. Numeral 1 of article 7 of the LOPD, when the consent of the Owner is necessary to carry out the treatment. Case in which it will be requested separately, and in strict compliance with the provisions of the LOPD in that regard.

7. Response time for queries or requirements

GHL will respond to the request within a maximum period of fifteen (15) days from receipt of the request. For its part, the requirements will be attended to within a maximum period of ten (10) days and the Owner must follow the same procedure.

Below are the details of the Personal Data Protection Officer for GHL:

- Angie Lorena Gonzalez Oyola
- +57 601 3139330
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8. Validity and changes

This Annex to the personal data processing policy is approved on May 22, 2024, the date from which it is applicable.

This Policy may be modified by GHL when required without prior notice, provided that they are non-substantial modifications. Otherwise, they will be previously communicated to the Owners.